

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

V.

1:17CR-00224-AT-CMS

ALLAN PENDERGRASS

PRELIMINARY MOTION TO FOR JACKSON-DENNO HEARING

Comes now the Defendant, by and through counsel, and files this, his motion to suppress any statement made to law enforcement officers while in custody or incarcerated in this matter. In support Defendant shows as follows: 1.

Counsel for Defendant does not believe the Defendant was questioned. However this motion is being filed in order to confirm that belief with certainty .If any said questioning occurred in may have been in violation of Defendant's Fifth, Sixth and Fourteenth Amendment Constitutional rights.

WHEREFORE, Defendant prays;

1. That a hearing be held,
2. That all evidence and fruits of any statement made by Mr. Pendergrass be suppressed, and
3. For such other relief that this Court deems appropriate.

Respectfully submitted,

S/Robert H. Citronberg

Robert H. Citronberg
Attorney for Defendant(CJA)
State Bar #126275

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing motion was served electronically on:

Mr. Jeff Brown
Assistant United States Attorney
75 Spring St., SW
Atlanta, Ga. 30303.

This 24th day of August, 2017

S/Robert H. Citronberg

Robert H. Citronberg
Attorney for Defendant

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